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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

JACQUELINE NAVARRO,	)	Case No.: 1:24-cv-01193-BAM
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	FOR AN EXTENSION OF TIME
vs.	)	
	)	
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended twenty (20) days from February 26, 2025, up to and including March 18, 2025. This is the Defendant's first extension request.

Defendant requests this extension in order to review the record; evaluate the issues raised in Plaintiff's brief; determine whether options exist for settlement; and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's counsel was recently assigned this case along with several other cases, and now has five cases due in the week of February 26, 2025. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is

made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

NEWEL LAW

Dated: February 12, 2025

/s/ Melissa Newel\*

(\*as authorized via e-mail)

MELISSA NEWEL

Attorney for Plaintiff

Dated: February 12, 2025

MICHELE BECKWITH

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

By: /s/ Michelle A. Pavelek

MICHELLE A. PAVELEK

Special Assistant U.S. Attorney

Attorneys for Defendant

### **ORDER**

Pursuant to the parties' stipulation, and cause appearing, Defendant shall have an extension, up to and including March 18, 2025, to respond to Plaintiff's Brief and Plaintiff's optional reply brief will be extended to April 1, 2025.

IT IS SO ORDERED.

Dated: February 18, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE